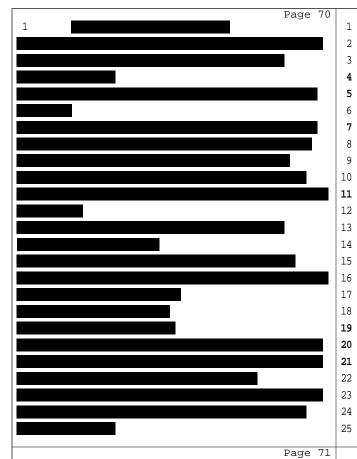
EXHIBIT 22

HOWARD RUBIN - 10/25/2018

1	UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK		
2	x HILLARY LAWSON, KRISTINA HALLMAN,		
3	STEPHANIE CALDWELL, MOIRA HATHAWAY, MACEY SPEIGHT, ROSEMARIE PETERSON, and		
4	LAUREN FULLER,		
5	Plaintiffs, Case No.: 1:17-cv-06404 (BMC)		
6	- against -		
7	HOMADD DIDIN TENNITEED DOMEDO		
8	HOWARD RUBIN, JENNIFER POWERS, and the DOE COMPANY,		
9			
10	Defendants.		
11	225 Broadway		
12	New York, NY 10007 October 25, 2018		
13	10:11 a.m.		
14			
15	VIDEOTAPED DEPOSITION of HOWARD RUBIN, in		
16	the above-entitled action, held at the above time		
17	and place, pursuant to order, taken before ESTAMARIE		
18	CASTELLI-VELEZ, a shorthand reporter and Notary		
19	Public within and for the State of New York.		
20			
21			
22			
23			
24			
25			



1 Mid-2000 sometime. Α 2 And who was that? 0 3 T --MR. MCDONALD: I'm going to object. 4 5 Consistent with the judge's ruling on the I 6 think it was the 29 of August, we're going to 7 object to any questions that would reveal the 8 identity of any of the women with whom he had 9 sexual relations other than the plaintiffs in 10 this case. And he's prepared to talk about 11 events that took place, but he's not going to 12 give you the names of any women. That's 13 consistent with the judge's order. 14 Was it Ms. Powers? 15 Α 16 So, you had been engaged in BDSM 17 activities prior to Ms. Powers, correct? 18 That's correct. 19 I'm going to ask a couple of questions 20 about some of the terms that you use. 21 What do you mean when you say that it

is a consensual interaction or a consensual

I'm talking about my experiences.

That's all I'm asking about.

23

24

25

relationship?

Α

Q

Page 72

A So, I will only have any kind of sexual relation with another women -- with a woman, if it's consensual.

Q Do you ever have BDSM sexual interactions with men?

A No.

Q What do you mean by consensual?

A That the women has agreed to the type of activity, BDSM activity, that we're going to engage in.

Q How does she show such agreement?

A Couple of different ways; she agrees and we have a discussion prior to our sexual activity beginning and I also use, which is common in BDSM sexual play, I use safe words.

MR. BALESTRIERE: I'm sorry. Can you -- can you read back the answer again or can I just look?

Q Okay, so you testified about having a discussion prior to the sexual activity. How does that discussion go?

A I talk, discuss what is going to happen beforehand, and just, you know, merely that. We have some kind of discussion beforehand about what activity might take place.

Page 73
How long does that discussion take?

A I could -- it could be short or it could be longer. I don't --

Q How long is longer?

A It could be -- we might discuss it for 60 minutes or more.

Q When you say shorter, how long is that?

A A few minutes.

Q This is a discussion that you have with the women who are submissive prior to engaging in any BDSM activity; is that correct?

A Yes.

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Q

Q What specifically do you discuss?

MR. MCDONALD: Objection to form.

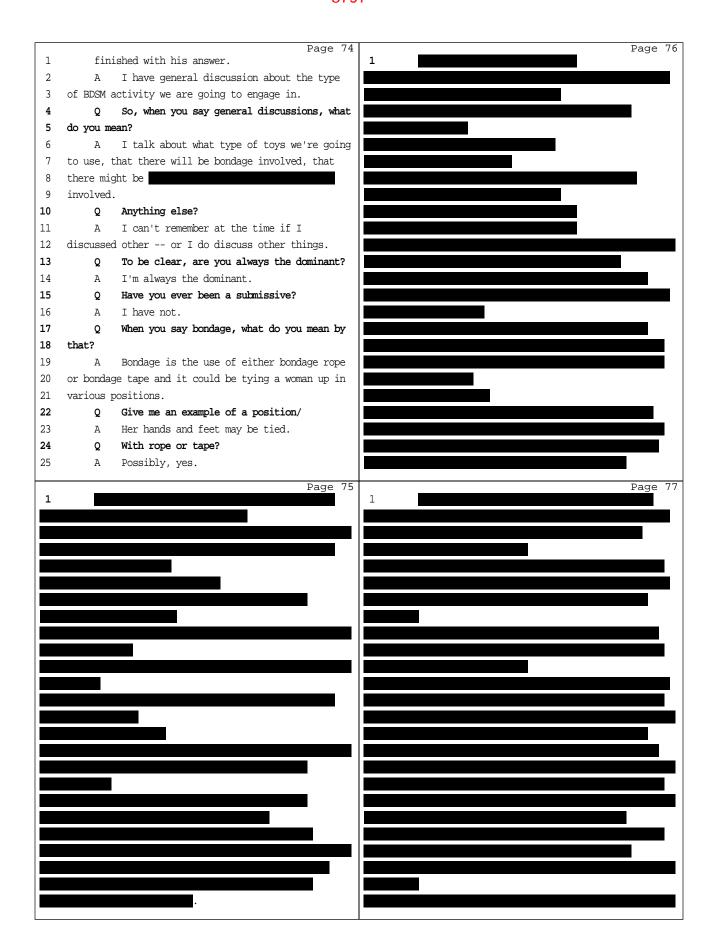
 ${\tt A} - {\tt I} \ {\tt don't} \ {\tt recall.} \ {\tt I} \ {\tt don't} \ {\tt remember} \ {\tt the} \ {\tt specifics.}$

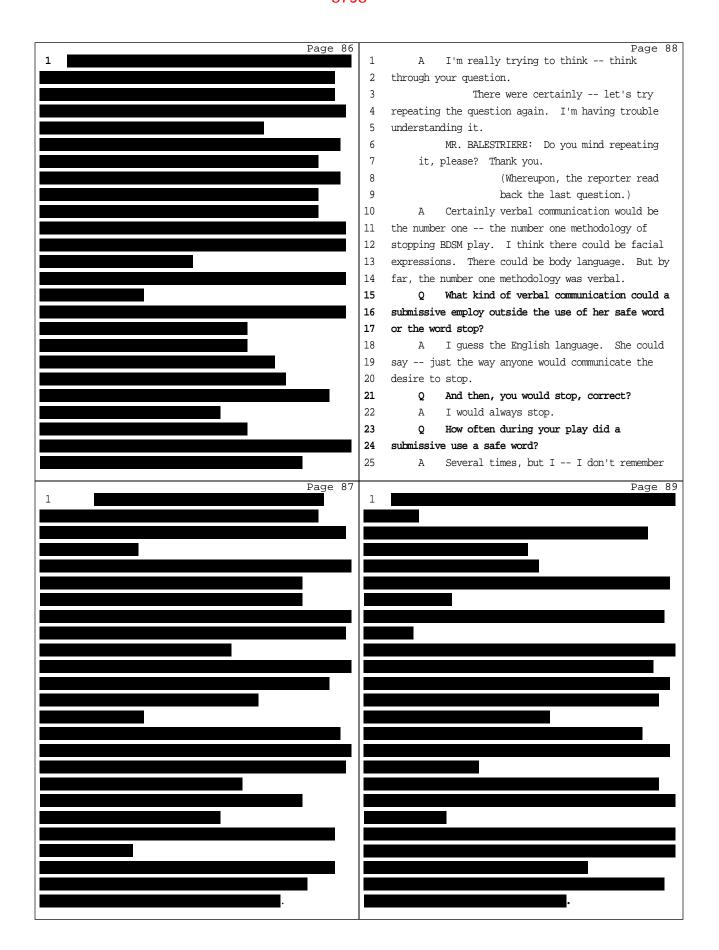
Q You don't remember ever what you discussed with any of the women with whom you've had these discussions prior to your engaging in BDSM activity?

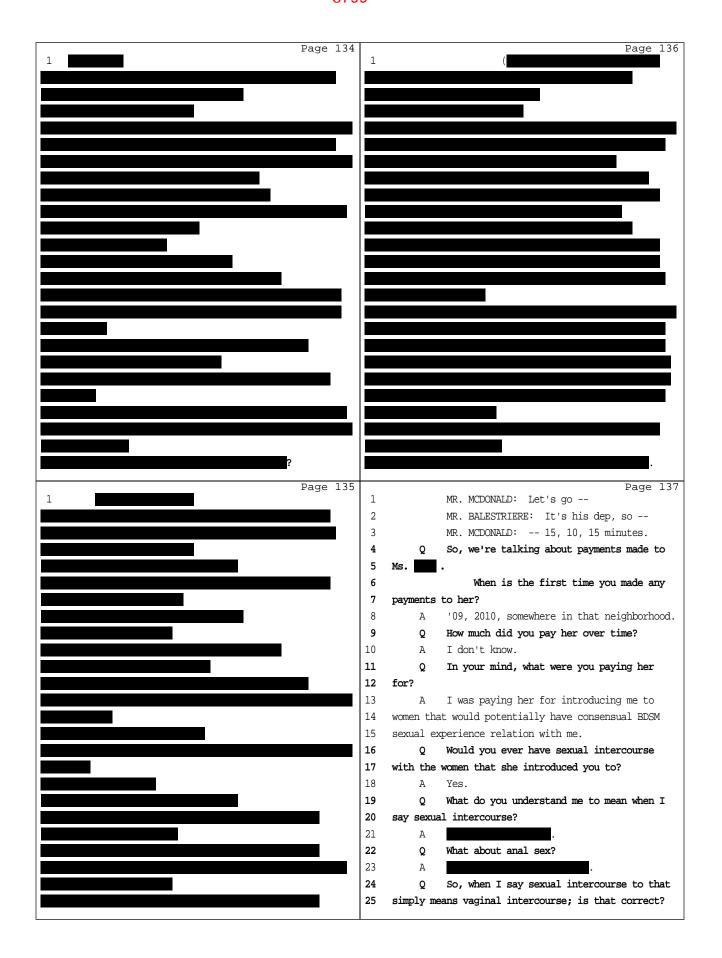
A If you're trying to say do I have the same discussion with every woman, then the answer is no. So, I have --

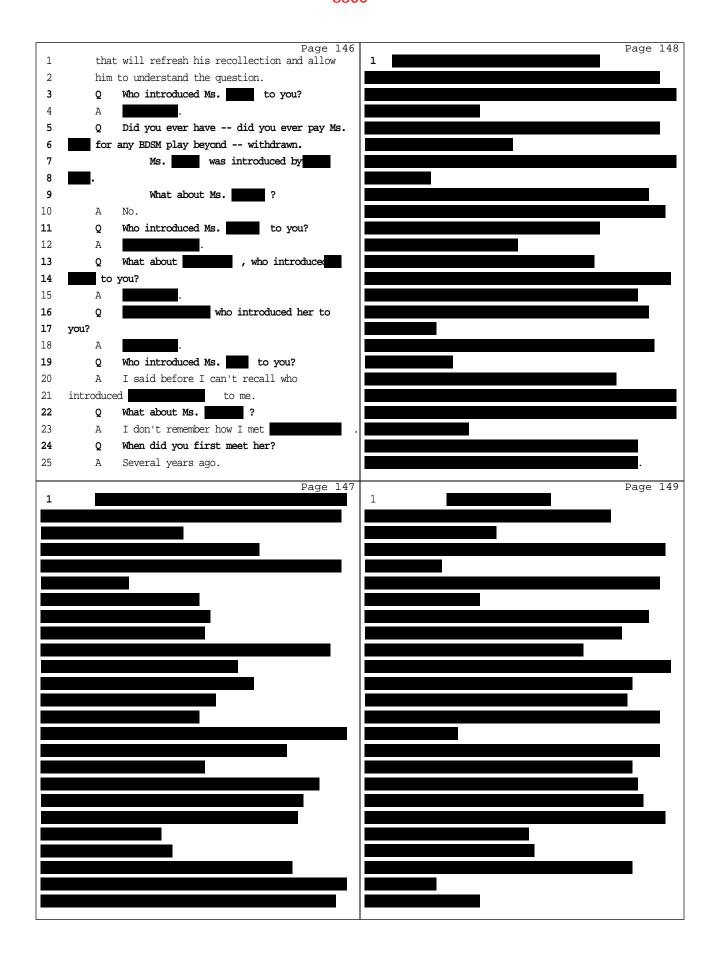
Q I'm not --

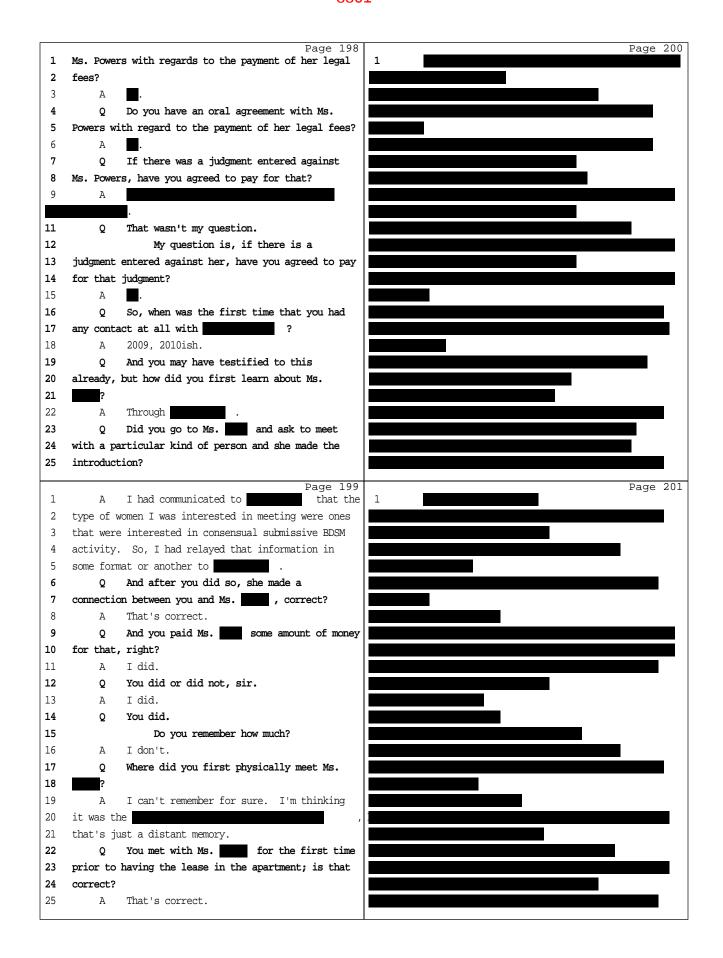
A -- general discussions -MR. GILBERT: I don't think he was

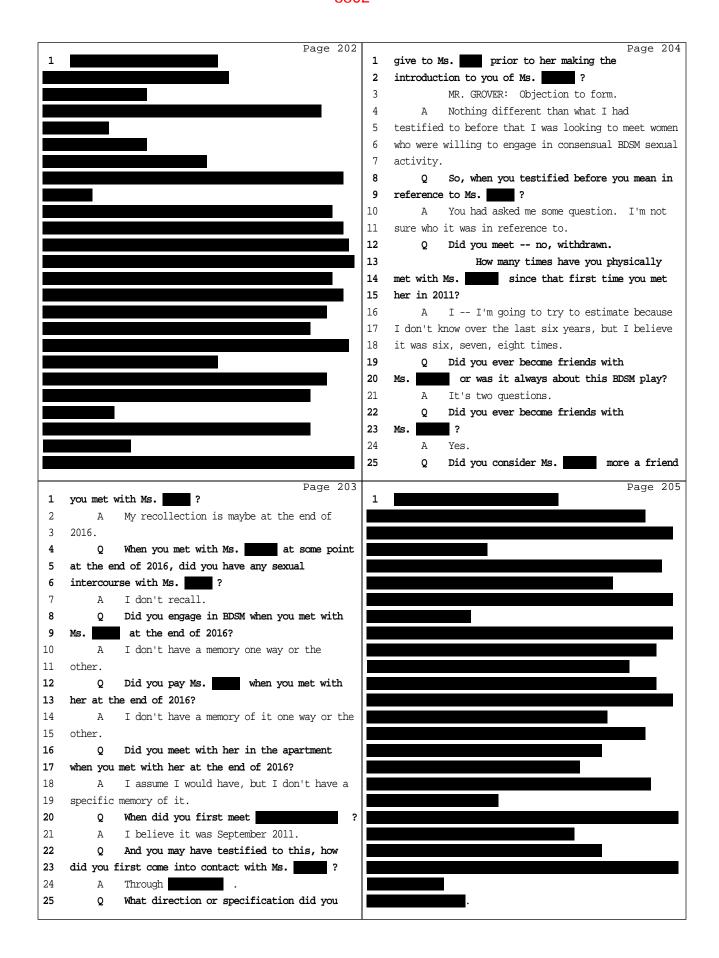












1	Page 206 Q What did she talk about?	1	Page 208 A No, and I didn't pay her any money.
2	A That she was addicted to heroin.	2	Q Prior to December 2016 when was the last
3	Q Did you ever get heroin for her?	3	time before that you remember meeting with Ms.
4	A No.	4	?
5	Q How many times did you pay Miss ?	5	A I believe it was January of 2016.
6	A I believe it was six or seven times.	6	Q Please tell me about that encounter.
7	Q When was the last time you paid Ms.	7	A We she came to the condo, the
8	; do you remember?	8	apartment. Jennifer Powers was there. I happened
9	A In June of 2017 I had met her at the	9	to be trying on some new clothing.
10	apartment. She had been texting me frequently in	10	kind of critiqued the outfits I was trying on and
11	the few weeks leading up to that telling me she was	11	then I took her out for dinner that night.
12	desperate and broke. I hadn't seen her in person	12	Q And did you engage in BDSM play that
13	for probably a year-and-a-half, and she mentioned to	13	night?
14	me that her father had died, and that she had been	14	A No.
15	kicked out of her apartment, and that she was	15	Q Did you have sexual intercourse with her?
16	desperate for money, and she was very interested in	16	A In other words, no sexual BDSM contact at
17	meeting up with me to have a consensual BDSM time,	17	all. It was a date, same as had been in same as
18	and she showed up at the apartment. She was wearing	18	we had in January of 2016. It's a date. I took her
19	sneakers, short shorts, and a tank top. She had	19	out for dinner. I didn't give her any money.
20	sores all over her body and she broke down crying.	20	Q I'm sorry. I may have gotten confused on
21	She told me that she I asked her what the sores	21	the dates. When was it that you were trying on the
22	were. She said she was addicted to heroin. I	22	clothes?
23	talked to her for about maybe 30 minutes, gave her a	23	A I believe it was twice in 2016. One was
24	hug. She left. She was in the apartment for less	24	in January, one was in December.
25	than an hour.	25	Q And you didn't pay her in December I think
1	Page 207 O Did you give her any money?	1	Page 209 was your testimony, right?
1 2	Q Did you give her any money?	1 2	was your testimony, right?
2	Q Did you give her any money? A After she left, I instructed Jennifer		was your testimony, right? A You know, as I recall.
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